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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

June 28, 2007

Mr. Matthew S. McCormick, Assistant Manager  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A7-50  
Richland, Washington 99352

Re: Hanford Federal Facility Agreement and Consent Order (HFFACO) Change Control Form  
for Milestone M-92-07-01

Dear Mr. McCormick:

The Department of Ecology approves the referenced HFFACO Change Control Form from the  
United States Department of Energy-Richland Operations Office. The signed HFFACO Change  
Control Form is enclosed.

If you have any questions, contact me at 509-372-7891.

Sincerely,

Laura J. Cusack  
TWT&TPA Section Manager  
Nuclear Waste Program

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EDMC

jc  
Enclosure

cc w/enc:

Nicholas Ceto, EPA  
Larry Gadbois, EPA  
Stuart Harris, CTUIR  
Gabriel Bohnee, NPT  
Lenora Seelatsee, Wanapum  
Russell Jim, YN  
Susan Leckband, HAB  
Ken Niles, ODOE  
Administrative Record: Milestone M-92✓  
Environmental Portal

cc w/o enc:

Richard Engelmann, EFSH  
Rob Piippo, FHI  
Judy Vance, FFS



<b>*Change Number</b> M-92-07-01	<b>Federal Facility Agreement and Consent Order</b>  <b>Change Control Form</b>  Do not use blue ink. Type or print using black ink.	<b>Date</b> 6/12/2007
<b>Originator</b> Matt S. McCormick	<b>Phone</b> (509) 373-9971	
<b>Class of Change</b> <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager		
<b>Change Title</b> Modification of <u>Hanford Federal Facility Agreement and Consent Order</u> (Agreement) M-92-05, “ <b>Determine disposition path and establish interim agreement milestones for Hanford Site Cs/Sr capsules.</b> ”		
<b>Description/Justification of Change</b>  This change package extends milestone TPA M92-05 from June 30, 2007 to June 30, 2017, for the disposition of Hanford cesium/strontium capsules. The recently issued performance assessment, “Hanford Cs-Sr Repository Disposal Performance Analysis Using the TSPA-FEIS Model (EDF-NSNF-072),” shows the viability of direct disposal of the capsules at the National High-Level Waste Repository. However, due to the schedule for the opening of the repository, DOE cannot make the necessary applications at this time to assure acceptance of the capsules. With the delays in the Hanford Waste Vitrification Facility, the critical path for making this decision is also delayed. If it turns out that the capsules do need to be vitrified, there will still be time for DOE to make the necessary changes to the WTP to do so. Therefore, RL is proposing this extension to reassess the continuing viability of direct disposal after final disposition requirements for the Repository can be determined.  This change package only extends the date for a final decision concerning the manner in which the capsules will be disposed of at the National High Level Waste Repository (i.e., via direct disposal, or after being vitrified). This change package does not alter the fact that the disposition pathway for capsules is disposal at the National High-Level Waste Repository.		
<b>Impact of Change</b> Delays the final decision for disposition of the capsules to 2017.		
<b>Affected Documents</b>  The <u>Hanford Federal Facility Agreement and Consent Order</u> , as amended and Hanford Site internal planning management, and budget documents (e.g., USDOE contractor Baseline Change Control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report).		

**Approvals**

Ecology

Date

Approved ☒ Disapproved ☐

DOE-RL

Date

Approved ☒ Disapproved ☐

EPA

Date

Approved ☐ Disapproved ☐

Number	Milestone Description and Completion Criteria	Due Date
M-92-05	<p data-bbox="272 327 1268 436"><b><del>Inclusion of Hanford site Cs/Sr "Treatment and/or Repackaging Parameters" in DOE TWRS Phase II Request for Proposals (Treatment and/or Repackaging of all remaining Cs/Sr).</del></b></p> <p data-bbox="272 478 1295 548"><b>Determine disposition path and establish interim agreement milestones for Hanford Site Cs/Sr capsules.</b></p> <p data-bbox="272 590 1276 846">DOE will assess the viability of <u>directly disposing</u> of the Hanford Cs/Sr capsules at the National High-Level Waste Repository <u>and provide a schedule leading to its disposition</u>. <u>Based on this assessment</u>, if DOE concludes that direct disposal is a viable and preferred alternative to vitrification, DOE will submit to Ecology specific documentation justifying its conclusion, with a proposed milestone change request establishing enforceable Agreement milestones for dispositioning Hanford Cs/Sr capsules <u>by 2028</u>.</p>	<p data-bbox="1328 327 1438 390"><b><del>June 30, 2007</del></b></p> <p data-bbox="1328 396 1438 459"><b>June 30, 2017</b></p>